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Attorneys for Defendant  
DAVID NUNN

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
DAVID NUNN  
  
Defendant.

Case No. 6:20-PO-00742-HBK

**JOINT MOTION TO EXTEND MOTION  
SCHEDULE; [PROPOSED ORDER]**

**MOTION**

The parties, through their respective counsel, Sean O. Anderson, Yosemite National Park Legal Officer, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender, counsel for the defendant, David Nunn, hereby jointly move this Court to extend the instant motion schedule, defendant's opening brief to be due on April 20, 2021.

Mr. Nunn was arraigned on January 12, 2021 before the Honorable Helena Barch-Kuchta. The government timely provided initial discovery. At the status conference on March 9, 2021, Judge Barch-Kuchta set a motion schedule, defendant's opening brief due April 6, 2021. In preparing the motion, the undersigned defense counsel discovered National Park Service regulations and practices which are of consequence to the case, and requested additional discovery on those matters. Defense counsel moves the court to extend the deadline for the opening brief to allow compliance and review of the additional discovery request. The government does not object.

1 Respectfully submitted,

2 Dated: April 4, 2021

/s/ Sean O. Anderson  
SEAN O. ANDERSON  
Legal Officer Yosemite National Park

4 Dated: April 4, 2021

HEATHER E. WILLIAMS  
Federal Defender

6 /s/ Benjamin A. Gerson  
BENJAMIN A. GERSON  
Assistant Federal Defender  
Attorney for Defendant  
David Nunn

9 **ORDER**

10 **GOOD CAUSE APPEARING**, the joint motion to extend the deadline for submission  
11 of the defendant's opening brief from April 6, 2021 to April 20, 2021 is granted.  
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14 Dated: April \_\_\_\_\_, 2021

15 HON. HELENA M. BARCH-KUCHTA  
United States Magistrate Judge  
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